

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SUFFOLK, ss.

DOCKET NO. 1:23-cv-11313

ANDRE BISASOR,)
Plaintiff,)
Vs.)
CRAIG S. DONAIS, RUSSELL F.)
HILLIARD, DONAIS LAW OFFICES)
PLLC, UPTON AND HATFIELD LLP,)
and MARY K. DONAIS,)
Defendants.)

)

**DEFENDANTS CRAIG S. DONAIS, MARY K. DONAIS AND DONAIS LAW OFFICES
PLLC'S MOTION TO DISMISS OR, IN THE ALTERNATIVE, TO TRANSFER TO
DISTRICT OF NEW HAMPSHIRE**

NOW COME Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC (the “Donais Defendants”), by their attorneys, and hereby request that this Honorable Court dismiss all claims against them pursuant to Fed. R. Civ. P. 12(b)(2), Fed. R. Civ. P. 12(b)(3), Forum Non Conveniens, and anti-SLAAP or, in the alternative, transfer this matter to the District of New Hampshire. In support of this motion, the Donais Defendants rely upon their Memorandum in Support of this Motion to Dismiss or, in the alternative, to Transfer to the District of New Hampshire, filed herewith.

WHEREFORE, Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC request that this Honorable Court dismiss all claims against them, or, in the alternative, transfer this matter to the District of New Hampshire.

Respectfully submitted,
FOR THE DEFENDANTS,
CRAIG S. DONAIS, MARY K. DONAIS
and DONAIS LAW OFFICES PLLC
By Their Attorney,

/s/ Edwin F. Landers, Jr.

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RULE 7.1(a)(2) CERTIFICATION

I hereby certify that I conferred with Plaintiff Andre Bisasor and attempted in good faith to resolve or narrow the issues addressed in this motion.

Date: June 13, 2023

/s/ Edwin F. Landers, Jr.
Edwin F. Landers, Jr.

CERTIFICATE OF SERVICE

I, Edwin F. Landers, attorney for the Defendants, Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC, hereby certify that I have this day served the foregoing to all counsel of record in this action by serving same via First Class U.S. mail, postage prepaid and/or electronic mail to:

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Date: June 13, 2023

/s/ Edwin F. Landers, Jr.

Edwin F. Landers, Jr.